

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re: SPHERATURE INVESTMENTS, LLC, <i>et al.</i> Debtors.¹	§ Chapter 11 § § Case No.: 20-42492 § § Joint Administration Requested §
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**STIPULATED ORDER EXTENDING (1) THE BAR DATE FOR THE CLAIMANTS TO
FILE PROOFS OF CLAIM TO JUNE 20, 2021 AND (2) THE RESPONSE AND
OBJECTION DEADLINE TO CERTAIN PENDING MOTIONS**

This stipulation and order (the “Stipulation”) is entered into by and among the debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), the Official Committee of Unsecured Creditors (the “Committee”), and Melody Yiru (the “Movant”), an individual with pending litigation against certain of the Debtors (together, the Debtors, the Committee, and Movant are collectively referred to as the “Parties,” and, each, as a “Party”). The Parties hereby stipulate and agree as follows:

RECITALS

WHEREAS under L.R. 3003-1, the last date for general unsecured creditors to file a proof of claim is 120 days after the Petition Date, or April 20, 2021;

WHEREAS the Debtors have agreed to extend the Bar Date to June 20, 2021 at 5:00 p.m., solely with respect to the filing of Proofs of Claim by Melody Yiru, and other former

¹ The “Debtors” in the above-captioned jointly administered chapter 11 bankruptcy cases (“Cases”) have listed their identification and EIN numbers as: Spherature Investments LLC (“Spherature”) EIN#5471; Rovia, LLC (“Rovia”) EIN#7705; WorldVentures Marketing Holdings, LLC (“WV Marketing Holdings”) EIN#3846; WorldVentures Marketplace, LLC (“WV Marketplace”) EIN#6264; WorldVentures Marketing, LLC (“WV Marketing”) EIN#3255; WorldVentures Services, LLC (“WV Services”) EIN #2220. The Debtors list their corporate headquarters in some pleadings, but not others, as 5100 Tennyson Parkway, Plano, TX 75024.

representatives or current representatives of the Debtors (in such capacities, collectively, the “Claimants”);

WHEREAS the Movant has filed a *Limited Motion to Reopen Orders on Application to Employ Foley & Lardner LLP [Dkt. No. 150] and Larx Advisors Inc. [Dkt. No. 148], to Compel Further Disclosures Under Fed. R. Bankr. Proc. 2014, and if Necessary, Amend Findings of Fact and Conclusions of Law* (the “Motion to Compel”) [Docket No. 173] and *Motion for Limited Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(D) to File Her Motion for Class Certification in the District Court and to Confirm No Automatic Stay Applies to the Non-Debtor Parties, or in the Alternative, for an Order Applying Fed. R. Bankr. Proc. 7023, Pursuant to Fed. R. Bankr. Proc. 9014(C) to Permit the Filing of a Motion for Class Certification in this Court and Related Relief* (the “Motion to Lift Stay”) [Docket No. 189];

WHEREAS the Movant has agreed to extend the response and objection deadline to the Motion to Compel and Motion to Lift Stay to April 30, 2021 at 5:00 p.m., solely with respect to the Debtors and the Committee;

WHEREAS the Debtors have filed a *Motion for Order (I) Authorizing the Debtors to Keep Certain Information in Schedules of Assets and Liabilities Confidential; (II) Approving Form and Manner of Notice to Certain Potential Claimants; and (III) Establishing Supplemental Deadline to File Proofs of Claim for Certain Potential Claimants* (the “Alternative Notice Motion”) [Docket No. 196];

WHEREAS the Debtors have agreed to extend the response and objection deadline to the Alternative Notice Motion to April 30, 2021 at 5:00 p.m., solely with respect to the Movant; and

WHEREAS the Debtors, the Committee, and the Movant, through their counsel, hereby stipulate to and submit the following Stipulated Order for the Court's approval.

WHEREAS in the context of determining whether “cause” exists regarding extensions of time, courts have considered resolution of issues involved, the good faith progress in resolving issues prior to the deadline, the amount of time elapsed in the case, and the number of previous requests made. *See e.g. In re Express One Int’l*, 194 B.R. 98, 100 (Bankr. E.D. Tex. 1996). There

have been no extensions or requests, the parties are discussing other contested matters, and this case has not been pending a significant time.

It is hereby ORDERED as follows:

1. The Bar Date is hereby extended, solely with respect to the Claimants, to June 20, 2021 (the “Extended Bar Date”).

2. Any Proofs of Claim filed by the Claimants before the Extended Bar Date shall be superseded in all respects by any Proofs of Claim filed subsequent to the Bar Date and on or before the Extended Bar Date, and shall not prejudice the Claimants in any way.

3. The Claimants expressly reserve their rights to timely amend, modify, or supplement any Proofs of Claim only to the extent any proofs of claim or amendments, modifications and/or supplements thereto are properly filed on or before (but under no circumstances later than) the Extended Bar Date, including, without limitation, to amend any dollar amount stated therein, specifying the dollar amount of any claim that is not stated in a specific amount therein, specifying the amount of interest, fees, costs, charges or expenses owed to the Claimants to the extent not set forth therein, or specifying additional interest, fees, costs, charges or expenses arising prior to the confirmation of any chapter 11 plan.

4. The Debtors reserve the right to object, assert any right, assert any claim, or raise any defense with respect to any claim asserted by the Claimants in the above captioned chapter 11 cases, including that any Proofs of Claim filed by one or more of the Claimants is not timely to the extent it is not filed by the Extended Bar Date.

5. The response and objection deadline to the Movant’s Motion to Compel and Motion to Lift Stay are hereby extended, solely with respect to the Debtors and the Committee, to April 30, 2021 at 5:00 p.m.

6. The response and objection deadline to the Debtors’ Alternative Notice Motion is hereby extended, solely with respect to the Movant, to April 30, 2021 at 5:00 p.m.

7. This Stipulated Order may be executed in multiple counterparts, each of which shall be deemed an original but all of which shall constitute one and the same instrument.

8. This Stipulated Order is without prejudice as to Ms. Yiru and any representatives' right to seek further extensions of the time period within which they may a Proof of Claim.

9. This Stipulated Order will not impact the deadline to file Proofs of Claim to the extent such deadline is extended by virtue of any other Motion or order of the Court, or based on any claim that may arise by virtue of rejection, or rejection damages.

10. This Stipulated Order is without prejudice to the Debtors', the Committee's, and the Movant's right to request and/or agree to further extensions of the response and objection deadlines to the Motion to Compel, Motion to Lift Stay, and/or the Alternative Notice Motion.

Dated: _____, 2021

HONORABLE BRENDA T. RHOADES
CHIEF UNITED STATES BANKRUPTCY JUDGE

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

DATED: April 15, 2021

/s/ Marcus A. Helt

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**COUNSEL FOR THE DEBTORS AND
DEBTORS IN POSSESSION**

DATED: April 15, 2021

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DATED: April 15, 2021

/s/ Blake J. Lindemann

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**COUNSEL FOR MELODY YIRU AND THOSE
SIMILARLY SITUATED**

CERTIFICATE OF CONFERENCE

I attest that concurrence in this filing has been obtained from all signatories above.

/s/ Blake J. Lindemann

Blake J. Lindemann

CERTIFICATE OF SERVICE

On April 15, 2021, I electronically submitted the foregoing document with the clerk of the court of the U.S. Bankruptcy Court, Eastern District of Texas, using the electronic case filing system of the Court. I hereby certify that I will serve the parties individually or through their counsel of record, electronically, or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Blake J. Lindemann

Blake J. Lindemann